

Application No. 09/609,197
Amendment "A" dated October 20, 2003
Reply to Office Action of July 30, 2003

REMARKS

Applicant and Applicant's attorney express appreciation to the Examiner for the courtesies extended during the recent Interview held on October 2, 2003. The amendments made by this paper are consistent with the proposals and claim amendments discussed during the Interview, and as reflected in the remarks that follow.

As indicated above, claim 26 has been canceled without prejudice and claims 1, 7, 8, 12, 19, 20, and 25 have been amended. Accordingly, claims 1-25 remain pending, of which five are independent claims: 1, 8, 13, 20, and 25. Claim 1 is an independent method claim with corresponding independent computer program product claim 13; claim 8 is an independent method claim with corresponding independent computer program product claim 20; and claim 25 is an independent system claim.

The Office Action objected to the drawings on various grounds. With respect to Figure 7, Applicant has removed the reference number 700 from the text of the specification and has removed the reference to step 710 from the description of Figures 9A-9C. With respect to Figure 1, Applicant has amended the specification to remove the inconsistencies noted by the Examiner. With respect to Figure 2, Applicants propose correcting the reference number of the server on the right of memory 208 to be "208b" so that the reference for the server is consistent with the text of the specification at line 9 of page 15. Upon approval from the Examiner, replacement drawing sheets will be submitted. These changes should address all outstanding issues with respect to the drawings.

The Office Action also noted use of certain trademarks in the application. Applicant has amended the specification to include generic terminology where appropriate, and has verified that the proprietary nature of trademarks used in the application has been respected by showing registered trademarks in capitals.

The Office Action rejected each of the pending claims under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent No. 6,061,740 to Ferguson et al. ("*Ferguson*").¹ As discussed during

¹As noted by the Examiner during the Interview, the Office Action incorrectly asserted that *Ferguson* qualifies as prior art under 35 U.S.C. § 102(b). Therefore, Applicant notes for the record that the remarks in this response are made simply assuming *arguendo* that *Ferguson* qualifies as prior art and should not be interpreted as acquiescing in the prior art status of that reference. Applicant specifically reserves the right to challenge the status of *Ferguson* as prior art should such become desirable or necessary in the future. Accordingly, arguments herein merely assume, *arguendo*, that *Ferguson* is a proper reference.

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the Interview, Applicant's invention, as claimed in independent method claim 1 for example, relates to a method of replicating security descriptors in a non-degenerative fashion within a heterogenic computer network. The method converts a first security descriptor that follows a first security descriptor specification into a version of the first security descriptor that follows a second security descriptor specification. The converted version of the first security descriptor is compared with the second security descriptor that also follows the second security descriptor specification. In order to assure that any changes to the second security descriptor are non-degenerative and reversible, the second security descriptor is changed to reflect at least some of the changes represented in the converted version of the first security descriptor. Similar comparison and change operations may be found in each of the other pending independent claims.

Ferguson discloses heterogeneous network management that includes synchronization. There is little or no detail with respect to how the synchronization is performed in *Ferguson*. As discussed during the Interview, for example, Figure 4 illustrates an administration system in which a set of representation objects 90 within a domestic system are synchronized with foreign objects 87 in a foreign computer system. Col. 8, l. 41 – col. 9, 54. (Domestic and foreign are terms used in *Ferguson* to indicate heterogeneous components.) Col. 8, ll. 54-57. When a change is detected, an event monitor sends a message to the foreign computer system that communicates the changes made to the representation objects 90. Col. 9, ll. 21-25. The replication agent receives the message and synchronizes the foreign objects to correspond to changes made to the representation objects. Col. 9, ll. 29-32. *Ferguson* describes this process as a *one-way synchronization* between the replication objects 90 and the foreign objects 87. Col. 9, ll. 35-37 (emphasis added).

In connection with Figure 8, *Ferguson* refers to an integration utility that converts between the Novell Directory Services ("NDS") and Microsoft's Security Accounts Manager ("SAM"). Upon execution, a synchronize command converts an NTUser object to an NTHybridUser object, populates an NDSUser with any values not already entered (NDS values trump SAM values), and creates a references between the NTHybridUser object and the NDSUser object. Any conflicts or differences in data between the NT and NDS objects can be displayed with a preview command prior to synchronization.

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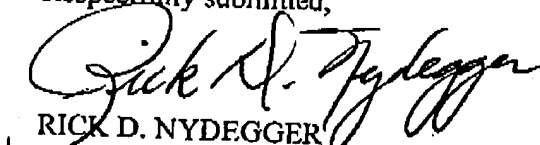
Note that while *Ferguson* provides few details with respect to the synchronization process, to the extent that *Ferguson* discusses synchronization, it appears that the operation is not non-degenerative (since one set of values trumps another), and therefore not reversible. Thus, among other things, *Ferguson* does not compare a converted version of a first security descriptor with a second security descriptor, both of which follow a second security descriptor specification, and changing the second security descriptor to reflect at least some of the changes represented in the converted version of the first security descriptor in order to assure that any changes to the second security descriptor are non-degenerative and reversible.

Based on at least the foregoing reasons, *Ferguson* does not anticipate or make obvious the claimed invention, as claimed in independent claims 1, 8, 13, 20, and 25.² During the Interview, the Examiner concurred, and indicated in the Interview Summary that the proposed claim amendments appear to overcome the prior art rejection, subject to further consideration by the Examiner upon receiving Applicant's formal response.

Accordingly, favorable reconsideration is requested. In the event that the Examiner finds any remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 20th day of October, 2003.

Respectfully submitted,



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² Because each of the remaining claims depends from one of the five independent claims, Applicant further submits that the rejections of record for the dependent claims are moot, and reserves the right to challenge any assertions in the Office Action with respect to the dependent claims in the future, as necessary or desirable.